Reconsideration of this application, as amended, is respectfully requested.

Claims 1, 3-9, and 11-14 remain pending. Claims 1, 3-9, and 11-14 have been rejected.

Claims 1, 7, and 9 have been amended. No claims have been cancelled. No claims have

been added. Support for the amendments is found in the specification, the drawings, and in the

claims as originally filed. Applicants submit that the amendments do not add new matter.

Applicants reserve all rights with respect to applicability of Doctrine of Equivalents.

Applicants have amended paragraphs [0002] of the specification to replace "continuation-

in-part" with "related to".

Claims 1, 3-9, 11, 13, and 14 have been rejected under 35 U.S.C. § 102(e) as being

anticipated by U.S. Patent No. 6,785,704 to McCanne et al. ("McCanne.2") in view of "Host

Anycasting Service" by Partridge et al. ("Partridge") in further view of U.S. Patent No.

6,820,133 to Grove ("Grove").

Amended claim 1 reads as follows:

A method, comprising:
    receiving, at an information object repository, a request from a client for
an information object at an address identified by a uniform resource locator
(URL);
    mapping the URL to a corresponding anycast address for the information
object, wherein the information object repository is selected according to
specified performance metrics by mapping an address of the client to one or more
addresses of information object repositories and to one or more addresses of
routers that have a best type-of-service distance to the address of the client,
wherein the mapping is performed by executing a Web Information Locator by
Distance (WILD) communication protocol between the routers that runs on top of
a Transmission Control Protocol (TCP);
    determining whether the anycast address can be resolved into a real
unicast address that is uniquely identified for the information object in the
Internet; resolving the anycast address for the information object to the unicast
address for the information object, if the corresponding anycast address can be
resolved into the unicast address, wherein resolving the anycast address comprises

sending an anycast resolution query to the anycast address according to an anycast address resolution protocol (AARP);

returning a failure if the anycast address cannot be resolved into the unicast address; and

obtaining a copy of the information object using the resolved unicast address.

(emphasis added)

The Examiner noted that McCanne.2 "does not disclose mapping an address of the client to one or more addresses of routers that have a best type-of-service distance to the address of the client by executing a WILD communication protocol between the routers." (Office Action, p. 4, 7/09/08).

Accordingly, McCanne 2 fails to disclose, teach, or suggest mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of-service distance to the address of the client, wherein the mapping is performed by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Partridge, in contrast, discloses host anycasting service, and also fails to disclose such limitations of amended claim 1.

Grove, in contrast, discloses delivery of web content using high-performance protocol between the specialized C and S nodes (Figure 1, col. 5, lines 53-67). In particular, Grove discloses the following:

In another aspect of an embodiment of the invention, the selector choosing the C-node bases its choice on a combination of factors, including the probability that the chosen C-node has the requested object in cache and communication performance measure including a measure for at least one sublink in the link from C-node to server. For example, one may estimate both the network distance from client to C-node, plus the distance from C-node to server, where the latter figure is weighted by the probability that the C-node does not have the requested object in cache. Selecting a C-node on this basis may optimize expected communication time averaged over all objects, including those not in cache. This aspect can be

used even if the communication from C-node to client does not pass through an intermediate S-node, and where this communication uses standard protocols. That is, this embodiment is of use even when the principle function of the C-node is simply as a cache.

(emphasis added)

Thus, Grove discloses choosing the C-node based on the combination of factors including the probability that the chosen C-node has the requested object in cache and communication performance measure including a measure for at least one sublink in the link from C-node to server. In contrast, amended claim 1 refers to mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers, <u>wherein the mapping is performed by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP)</u>.

Accordingly, Grove also fails to disclose, teach, or suggest mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of-service distance to the address of the client<u>, wherein the mapping is performed by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP)</u>, as recited in amended claim 1.

Thus, neither McCanne2, Partridge, nor Grove discloses, teaches, or suggests such limitations of amended claim 1.

Applicants respectfully submit that the rejection is the result of impermissible hindsight reconstruction, using applicants' claims as a frame while selecting components from <u>three</u> references to fill the gaps of this mosaic obviousness argument. (see Interconnect Planning Corp. v. Feil, 774 F2d 1132, 1143 (Fed. Cir. 1985)). The motivation to combine components

from these references is based upon impermissible hindsight gleaned only from applicants' disclosure and not from the references themselves.

Furthermore, even if McCanne 2, Partridge, and Grove were combined, such a combination would still lack mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of-service distance to the address of the client, wherein the mapping is performed by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Therefore, applicants respectfully submit that claim 1, as amended, is not anticipated under 35 U.S.C. § 102(e) by McCanne.2, in view of Partridge, and further in view of Grove.

Given that claims 3-9, 11, 13, and 14 contain the limitations that are similar to those limitations discussed with respect to amended claim 1, applicants respectfully submit that claims 3-9, 11, 13, and 14 are not anticipated under 35 U.S.C. § 102(e) by McCanne.2, in view of Partridge, and further in view of Grove.

The Examiner has rejected claims 1, 3-9, and 11-14 under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,415,323 to McCanne et al. ("McCanne") in view of McCanne.2, in further view of "Application-Layer Anycasting" by Bhattachargee et al. ("Bhattachargee"), in further view of Grove.

As set forth above, the Examiner noted that McCanne. 2 "does not disclose mapping an address of the client to one or more addresses of routers that have a best type-of-service distance to the address of the client by executing a WILD communication protocol between the routers." (Office Action, p. 4, 7/09/08).

The Examiner also noted that McCanne "also does not disclose mapping the client to a router address that have a best type-of-service distance to the address of the client by executing a WILD communication protocol between the routers." (Office Action, p. 8, 7/09/08).

Accordingly, neither McCanne, nor McCanne 2 discloses, teaches, or suggests mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of-service distance to the address of the client, wherein the mapping is performed by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Bhattacharjee, in contrast, discloses application-layer anycasting, and also fails to disclose such limitations of amended claim 1.

As set forth above, Grove, in contrast, discloses choosing the C-node based on the combination of factors.

Accordingly, Grove also fails to disclose, teach, or suggest mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of-service distance to the address of the client, wherein the mapping is performed by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Thus, neither McCanne, McCanne2, Bhattacharjee, nor Grove discloses, teaches, or suggests such limitations of amended claim 1.

Applicants respectfully submit that the rejection is the result of impermissible hindsight reconstruction, using applicants' claims as a frame while selecting components from four references to fill the gaps of this mosaic obviousness argument. (see Interconnect Planning

Corp. v. Feil, 774 F2d 1132, 1143 (Fed. Cir. 1985)). The motivation to combine components from these references is based upon impermissible hindsight gleaned only from applicants' disclosure and not from the references themselves.

Furthermore, even if McCanne, McCanne.2, Bhattacharjee, and Grove were combined, such a combination would still lack mapping an address of the client to one or more addresses of information object repositories and to one or more addresses of routers that have a best type-of-service distance to the address of the client, wherein the mapping is performed by executing a Web Information Locator by Distance (WILD) communication protocol between the routers that runs on top of a Transmission Control Protocol (TCP), as recited in amended claim 1.

Therefore, applicants respectfully submit that claim 1, as amended, is not obvious under 35 U.S.C. § 103(a) over McCanne, in view of McCanne.2, in view of Bhattacharjee, and further in view of Grove.

Given that claims 3-9, and 11-14 contain the limitations that are similar to those limitations discussed with respect to amended claim 1, applicants respectfully submit that claims 3-9, and 11-14 are not obvious under 35 U.S.C. § 103(a) over McCanne, in view of McCanne.2, in view of Bhattacharjee, and further in view of Grove.

It is respectfully submitted that in view of the amendments and arguments set forth herein, the applicable rejections and objections have been overcome. If there are any additional charges, please charge Deposit Account No. 022666 for any fee deficiency that may be due.

Respectfully submitted,

BLAKELY, SOKOLOFF, TAYLOR & ZAFMAN LLP

Date: _10/09/2008_____   By: _/Tatiana Rossin/_____
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